



BY APPOINTMENT TO
HER MAJESTY THE QUEEN
WINE MERCHANTS
CORNEY & BARROW LIMITED
LONDON



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HRH THE PRINCE OF WALES
WINE MERCHANTS
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**CORNEY &
BARROW**
INDEPENDENT WINE MERCHANTS-1780

Modern Slavery Act: Slavery and Human Trafficking Statement

Financial Year 2015/16

Introduction

Corney and Barrow fully supports the United Kingdom's stance on combatting human trafficking and modern slavery and is pleased to outline the action that we have taken during our 2015/16 financial year to help tackle these abhorrent crimes.

Our business is 230 years old and is one of the longest established Independent Wine Merchants in the UK. The company is privately owned and has grown nationally and internationally with sales offices in London, Edinburgh, North Yorkshire and, more recently, Hong Kong and Singapore. We also run shops in Newmarket and Ayr, having acquired the Scottish Merchants Whighams of Ayr in 1994.

We offer carefully-selected, honestly-priced wines to our customers that not only deliver quality and value for money, but also a sense of place. We want to offer benchmark styles; wines which we believe to be the best examples of a wine style, country, region or sub-region, whether they are wines to drink immediately or wines to lay down. As such, wherever possible we aim to build exclusive relationships with our suppliers, meaning that we develop good knowledge of their operations and business practices, putting us in a strong position to identify malpractice.

Our approach to business is an ethical one and to support this we have developed and published:

- Our 5 Corporate Values: Relationships, Spirit, Excellence, Independence and Integrity
- An Anti-Bribery Policy
- A Fraud Policy
- A Code of Conduct for Members of Staff incorporating a Whistleblowing Policy
- A Sales Code of Conduct

We currently hold two Royal Warrants as suppliers to HM Queen Elizabeth II and HRH The Prince of Wales. We are members of 'The Bunch', a group of Britain's leading independent wine merchants, which champions the causes of both the independent wine trade and individual, 'grower-made' wines. Established in 1993, membership is limited to six merchants of which Corney & Barrow is one. This small, select group has created and adheres to its own Code of Practice.

Our structure

During the last financial year to 30 April 2016, Corney & Barrow Group Ltd, a private company, acted as an investment holding company with three trading subsidiaries:

Corney & Barrow Ltd: The principal activity of the Company is that of wine and spirit merchants.

Corney & Barrow Bars Ltd: The principal activity of the Company is the operation of bars.

Corney & Barrow Group Services Ltd: The principal activity of the Company is that of provider of management services and facilities to other Group members.

Since the year end, Corney & Barrow Bars Ltd has been sold to a third party.

Assessing and Managing Risk

The management of risk within Corney & Barrow falls under the scrutiny of the Audit and Remuneration Committee; modern slavery & human trafficking has therefore appeared as an agenda item for the Committee and will continue to do so in the future. Responsibility for implementing the firm's activities to counter modern slavery lies with the Group Commercial Director. We are members of the Wine and Spirit Trade Association. We support their efforts to encourage member companies to develop relationships with their supply chains so that information about modern slavery and human trafficking risks can be identified and appropriately shared.

Action taken

During the last financial year Corney & Barrow has taken the following action to detect and counter the risks of human trafficking and modern slavery taking place within our supply chain:

- We have developed and published a Modern Slavery and Human Trafficking policy.
- We have reviewed and rationalised our supplier database, ensuring that the information that we hold on our suppliers is up to date and verified.
- We have registered with HM Revenue & Customs under the Alcohol Wholesale Registration Scheme, which helps to ensure that the wine that we offer for sale originates from verifiable sources.
- We have put in place a comprehensive, risk-based process to undertake due diligence on our supply chain.
- We have undertaken a risk assessment on our supply chain with regard to modern slavery and human trafficking in order to identify those suppliers where these are at greatest risk of occurring. To do this we have examined the risks according to the country where our suppliers are based, such as Chile and Argentina, together with the sectors in which our business operates, such as shipping and haulage.
- We have prepared awareness information for all our members of staff to enable them to understand what modern slavery is and to know what to do should they suspect that it might be occurring.

Action to be taken over the coming year

- We will be asking entities within our supply chain to tell us what they are doing to combat modern slavery and human trafficking.
- We will be distributing the awareness information to our members of staff, particularly those responsible for developing and maintain relationships with our suppliers, and monitoring the effectiveness of its content.

- We will continue to monitor and evaluate our action to counter modern slavery and human trafficking at Board level (by the Audit and Remuneration Committee).

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for our last financial year.